IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DIMOV ASSOCIATES LLC d/b/a DIMOV TAX AND CPA SERVICES and DIMOV WASSERMAN LLC

Plaintiffs,

-against-

MARC WASSERMAN, DAVID KANE and SELECTIVE FINANCIAL SOLUTIONS

Defendants,

Civil Action

No. 25-5410

ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER

JURY TRIAL DEMANDED

UPON the Declaration of Jacqueline Heston, sworn to May 21, 2025, the Declaration of April Moore, sworn to May 23, 2025, and the Declaration of George Dimov, sworn to May 23, 2025, and the exhibits annexed hereto, the Complaint filed in this matter, and the accompanying Memorandum of Law, it is hereby:

ORDERED, that Defendants Marc Wasserman, David Kane and Selective Financial Solutions show cause before the Honorable Karen M. Williams, United States District Judge, at the United States District Court for the District of New Jersey, 4th & Cooper Streets, Camden, New Jersey, Courtroom 4A, at 10 a.m.p.m., on the 12th day of 15th 2025, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining Defendants Marc Wasserman, David Kane and Selective Financial Solutions, together with their officers, directors, and agents, during the pendency of this action from:

- 1. Soliciting, contacting, servicing, or otherwise communicating with any current or former clients or customers of Plaintiffs for any business purpose;
- Transferring, encumbering, concealing, dissipating, or otherwise disposing of any 2. assets, including but not limited to bank accounts, investment accounts, real property, personal property, vehicles, art, cryptocurrency, or any other assets of value;
- 3. Destroying, deleting, altering, or concealing any documents, electronic data, communications, financial records, client information, or other evidence relating to Plaintiffs' claims;
- 4. Accessing any of Plaintiffs' physical locations, computer systems, email accounts, or other information technology resources for any purpose;
- Using or disclosing any of Plaintiffs' confidential or proprietary information, 5. including but not limited to client lists, client contact information, financial information, tax preparation methods, or business strategies;
 - 6. Directly, Contacting any employee, owner or investor of any of the Plaintiffs;
- 7. Instructing, requesting, or encouraging any third parties to engage in any of the foregoing prohibited acts; and it is further

ORDERED that personal or electronic mail service of a copy of this order and annexed Affidavit, Declarations, and Complaint upon the defendants or their counsel on or before _ o'clock in the $f \cdot M \cdot$ noon, on the 30^{lk} day of May, 2025 shall be deemed good and sufficient service thereof; and it is further

ORDERED that Defendants shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief by <u>June 5</u>, 2025. The original documents must be filed with the Court, with copies of same being served upon Plaintiffs' counsel; and it is further

ORDERED that Plaintiffs may file and serve any written reply to Defendants' opposition by <u>June 9</u>, 2025. The reply papers must be filed with the Court, with copies of same being served on Defendants' counsel; and it is further

ORDERED that if Defendants do not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that Plaintiffs file the proof of service referenced above and a proposed form of Order at least three (3) days prior to the return date; and it is further

ORDERED that the Court will entertain oral argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and parties are advised to the contrary no later than June 11, 2025.

DATED: (124), 2025

ÇAREN M. WILLIAMS

UNITED STATES DISTRICT JUDGE